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November 25, 2020

VIA ECF

Hon. Alison J. Nathan, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

**Re: *Reyes et al v. Central Park Boathouse, LLC et al*
Case No. 18 Civ. 11900 (AJN)**

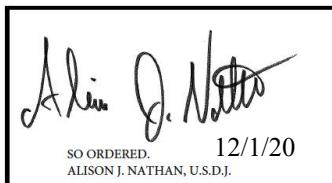
Dear Judge Nathan:

We represent Defendants Central Park Boathouse, LLC d/b/a The Loeb Boathouse Central Park (“The Boathouse”), sued incorrectly herein as “Central Park Boathouse, LLC (d/b/a The Loeb Boathouse),” Dean Poll, and Michael Amore (collectively “Boathouse Defendants”), and submit this letter jointly with counsel for Defendant Romeo Quiambao (sued incorrectly herein as “Ronny Doe”).

Boathouse Defendants and Defendant Quiambao write to respectfully request that they be permitted to continue fact discovery during the expert discovery period, which is scheduled to close on December 26, 2020. The Boathouse Defendants and Defendant Quiambao noticed and confirmed Plaintiff’s deposition for November 17, 2020. Counsel for Defendants, a court reporter and an interpreter appeared virtually on that day for Plaintiff’s deposition. Plaintiff and his counsel, however, failed to appear. After the scheduled start time, we contacted Plaintiff’s counsel to inquire about his and his client’s whereabouts. Plaintiff’s counsel advised us that he misunderstood the emails the Parties had previously exchanged – which included, along with the confirmed date for Plaintiff’s deposition, a number of proposed dates for the depositions of the Individual Defendants, some of which would require requesting an extension of the fact discovery deadline – and mistakenly thought that Plaintiff’s deposition was being adjourned. Accordingly, Boathouse Defendants and Defendant Quiambao request an extension of the fact discovery deadline.

SO ORDERED.

This is the Parties’ sixth request for an extension of the fact discovery deadline. Your Honor granted the Parties’ prior requests. Plaintiff consents to this request.



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The Parties have conferred and, subject of course to Your Honor granting this request, have agreed to the following revised schedule for depositions: December 4, 2020 – Plaintiff's deposition; December 10, 2020 – Defendant Amore's deposition; December 16, 2020 – Defendant Quiambao's deposition; and December 21 or 22, 2020 – Defendant Poll's deposition.

The parties remain available for the Status Conference with the Court scheduled for December 18, 2020, at 3:45 PM. However, if the instant request is granted and the Court prefers we are amenable to a new date convenient for the Court after the conclusion of discovery.

We thank the Court for its consideration in this regard.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Jason A. Zoldessy
Jason A. Zoldessy
Damon W. Silver

cc: All Counsel (Via ECF)

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